

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:16-CR-60-H-2

UNITED STATES OF AMERICA

v.

RONNIE L. DAVIS

MOTION TO CONTINUE
ARRAIGNMENT

On May 24, 2016, Mr. Ronnie L. Davis was indicted with charges relating to fraud and payment of bribes. [DE 1.] On August 23, 2016, the government filed a superceding indictment against Mr. Davis, adding charges of tax fraud. [DE 32.] The arraignment is currently set for January 9, 2017. [DE 58.] In order to continue the discovery review, to continue plea negotiations with the government, and to continue to investigate and confer with the client, undersigned respectfully requests a thirty-day continuance of the arraignment until the February term of court. Assistant United States Attorney David Bragdon does not object to a continuance of the arraignment.

Because the ends of justice served by this motion outweigh the best interests of the public and the Defendant in a speedy trial, such period of delay resulting from this continuance shall be excluded pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted this 2nd day of January, 2017.

THOMAS P. McNAMARA
Federal Public Defender

/s/ Katherine E. Shea
KATHERINE E. SHEA
Assistant Federal Public Defender

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

David Bragdon

U. S. Attorney's Office
Suite 800, 310 New Bern Ave.
Raleigh, NC 27601
919-856-4530
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Email: david.bragdon@usdoj.gov

by electronically filing the foregoing with the Clerk of Court on January 2, 2017, using the CM/ECF system which will send notification of such filing to the above.

This the 2nd day of January, 2017.

/s/ Katherine E. Shea
KATHERINE E. SHEA
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